Remarks

The paragraph numbers hereafter match Office Action paragraph numbers that they are associated with.

2. Applicant has amended the specification to deal with the objection to reference numeral 720.

3-4. The Office Action rejected each of claims 54-61, 63 and 65-73 as obvious over Dolin in view of Richardson. Claim 55 has been cancelled as its limitations are already in claim 54. Applicant strongly traverses the balance of this rejection.

Regarding claim 54, claim 54 requires, among other things, the steps of (1) providing a rule set including rules that indicate probable relative resource positions, (2) determining if first and second resource relative positions are consistent with a rule set and (2) where the relative positions are inconsistent with the rule set, performing a secondary function.

The Office Action correctly points out that Dolin fails to teach or suggest either of steps (2) and (3) referenced above (i.e., fails to suggest the steps of (2) determining if the first and second resource relative positions are consistent with a rule set and (3) where the relative positions are inconsistent with the rule set, performing a secondary function.

In addition, Applicant has examined Dolin in detail and is clear that Dolin fails to teach or suggest a rule set that indicates probable relative resource positions. To this end, the Office Action cites sections of columns 4 and 7 as teaching this limitation. Applicant has examined the cited sections of Dolin (and the rest of Dolin for that matter) and is clear that a probable relative resource position rule set is not contemplated. In this regard, the column 4 sections of Dolin cited describe a system wherein a person charged with configuring a network is provided with sticker type labels or the like for

each network node during installation of each node. When a node is installed, the configuring person attaches an associated label to a building layout map indicating the location of the installed node. After all nodes have been installed and associated labels have been attached to the map, the configuring person accesses an electronic version of the map, uses the paper map with labels to identify locations of the nodes, selects locations on the electronic version of the map (e.g., via a light pen) at which the nodes are located and then reads the node codes from the paper map to associate the nodes with the locations within the building. Thereafter, the column 7 section of Dolin cited teaches that the configuring person can group the nodes together or associate the nodes with each other by selecting nodes on the electronic version of the map and performing an association step.

In these sections of Dolin there is absolutely no teaching of a rule set that indicates probable relative resource positions. In the case of the steps whereby tag labels are placed on the hard copy paper map, the tags are appended to the map to indicate the actual locations of the nodes in a building, not the probable relative resource positions. Where the configuring person uses the electronic map to identify node locations, the actual locations are identified. Where the user uses the electronic map to associate nodes with each other, the user can select any of the nodes to associate with each other and there are no rules regarding relative resource positions.

In the event that the Examiner maintains this rejection Applicant requests that the Examiner more clearly point out where Dolin actually specifies a rule set that indicates probable relative resource positions so that Applicant can more precisely respond.

Turning to Richardson, as an initial matter, as appears to be recognized by the Office Action, Richardson fails to teach or suggest a probable relative resource position rule set and therefore, even when considered together, neither of the cited references teaches this limitation.

Regarding the other two steps of determining and performing a secondary

function when resource positions are inconsistent with the rule set, clearly the heart of those steps is that each is premised on their first being a probable relative resource position rule set. In this regard, Richardson has, in short, been cited as a reference that causes a first resource to be moved with respect to a second resource after a position command for the first resource is generated and a system recognizes that the first resource is not in the commanded position. This is clearly different than performing a secondary process only when first and second resources that communicate with each other are in positions that are inconsistent with a probable relative resource position rule set.

In addition, after a perusal of Richardson's long specification, it appears as though there may be a controller that controls operation of the elevator, transporter and printer and that the elevator and transporter do not communicate with each other. Here, claim 54 requires, among other things, the step of specifying that the first resource communicates with the second resource – this step appears to be lacking in Richardson as well.

For at least the above reasons Applicant believes claim 54 and claims that depend there from recite patentable subject matter and requests that the current rejections be withdrawn.

With respect to claim 56, that claim further limits claim 54 by requiring that the rule set indicates a maximum distance between the second resource and a reference point within the space such that, when the distance between the reference point and the second resource is greater than the maximum distance, the relative juxtapositions of the first and second resources are inconsistent with the rule set. Applicant has examined Richardson's Col. 15, lines 23-57 which only appears to describe specifics about a front edge guide which have absolutely nothing to do with a rule set that indicates a maximum distance or that juxtapositions will be in consistent with a rule set when a second resource is more than the maximum distance from a point.

With respect to claim 57, claim 57 further limits claim 54 by requiring that the reference point is the location of the first resource. Nothing in Dolin and specifically in the cited section appears to teach that a point of one resource is a reference point in a rule set of any type. Again, the cited sections of Dolin only teach a general process and have nothing to do with rule specifics.

Claim 59 further requires that the method is performed in real time as a resource is added to a sub-set of resources to perform the process. While Dolin is cited as teaching this limitation Applicant is clear that Dolin fails in this regard. To this end, the claim 54 method requires several steps including the last two (i.e., determining and performing). The Office Action admitted that Dolin fails to teach or suggest the last two steps so how can Dolin teach that the method, including all of its steps, is performed in real time?

Claim 60 further requires that the method be performed in batch after a sub-set of resources has been configured to perform the process. While Dolin is cited as teaching this limitation Applicant is clear that Dolin fails in this regard. To this end, the claim 54 method requires several steps including the last two (i.e., determining and performing). The Office Action admitted that Dolin fails to teach or suggest the last two steps so how can Dolin teach that the method, including all of its steps, is performed in batch?

Claim 61 further requires the steps of correlating logical network addresses with space locations and wherein the step of identifying the relative positions of the first and second resources includes specifying a network address for each of the first and second resources, determining the locations of the first and second resources from the correlated information and using the first and second resource locations to determine relative positions of the first and second resources. In Dolin, locations are manually

determined and are not derived from network addresses. To this end, in the case of applying node ID labels to the paper hard copy map, the system user applies the labels manually to indicate node locations. In the case of using the electronic map to select locations associated with nodes, the system user uses a light pen or the like to select locations and then assigns addresses or node IDs thereby by reading bar codes or the like from the labels on the paper map. In neither of these cases are network addresses used to identify locations of resource.

For at least the additional above reasons Applicant believes each of claims 56, 57, 59, 60 and 61 recites patentable subject matter and requests that the current rejections thereof be withdrawn.

Claim 63 includes limitations that are similar to the limitations of claim 54 described above and Applicant believes claim 63 and claims that depend there from recite patentable subject matter for the same reasons as claim 54 described above. For these reasons Applicant requests that the current rejections of claim 63 and claims that depend there from be withdrawn.

Claim 65 includes limitations that are similar to the limitations of claim 54 described above and Applicant believes claim 65 and claims that depend there from recite patentable subject matter for the same reasons as claim 54 described above. In addition, claim 65 includes limitations similar to the limitations of claim 61 described above (i.e., requiring determination of resource positions/locations from network addresses) which are not taught or suggested by the cited art. For the reasons described above with respect to claims 54 and 61 Applicant requests that the current rejections of claim 65 and claims that depend there from be withdrawn.

Claim 66 includes limitations similar to the limitations described above with

respect to claim 56 and is believed to recite patentable subject matter for the same additional reason that claim 56 recites patentable subject matter.

Claim 68 includes the steps of, among others, using the processor to automatically perform the steps of (i) identifying the resources to be positioned within the sub-space, (ii) identifying the tags associated with the resources and (iii) indicating the tags associated with the resources. Nothing in Dolin teaches or suggests that a processor automatically performs these steps. Specifically, the cited section of Dolin (col. 4, lines 21-41) simply teaches a manual process for applying tags to a paper map and then manually indicating locations on an electronic map and reading labels from the paper map to associate locations with node IDs. Richardson fails to teach what Dolin lacks in this regard (and therefore, not surprisingly, was not cited as teaching these limitations). For at least this reason Applicant believes claim 68 and claims that depend there from recite patentable subject matter and requests that the current rejection be withdrawn.

Claim 71 requires that the information device includes a display and wherein the step of identifying the tags includes providing a list of the tags and the step of indicating one of the tags includes selecting one of the tags from the list. Thus, combining the claim 71 and 68 limitations, at a minimum, the claim requires determining the location of an information device that include a display. The only device in Dolin that includes a display is the device that generates the electronic map and clearly Dolin fails to teach or suggest determining the location of that device.

As a final note Applicant points out that Applicant has examined the cited references in their entirety and believes that, in each case, the reference is consistent with Applicant's comments above.

Applicant believes the amended claims recites patentable subject matter and allowance of the same is requested. No fee in addition to the fees already authorized in this and accompanying documentation is believed to be required to enter this amendment, however, if an additional fee is required, please charge Deposit Account No. 17-0055 in the amount of the fee.

Respectfully submitted,

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